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[Additional Counsel on Signature Page]

Attorneys for Class Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SUNIL SUDUNAGUNTA,
Individually and on behalf of all
others similarly situated.

Plaintiff

NANTKWEST, INC., PATRICK
SOON-SHIONG, RICHARD
GOMBERG, BARRY J. SIMON,
STEVE GORLIN, MICHAEL D.
BLASZYK, HENRY JI, RICHARD
KUSSEROW, JOHN T. POTTS, JR.,
ROBERT ROSEN, JOHN C.
THOMAS JR., MERRILL LYNCH,
PIERCE, FENNER & SMITH, INC.,
CITIGROUP GLOBAL MARKETS
INC., JEFFERIES LLC, PIPER
JAFFRAY & CO., and MLV & CO.,
LLC.

Defendants

Case No. 16-cv-01947-MWF-JEM

Consolidated with
2:16-cv-3438-MWF-JFM

CLASS ACTION

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR (i)
AWARD OF ATTORNEYS' FEES,
(ii) REIMBURSEMENT OF
LITIGATION EXPENSES, AND (iii)
PLAINTIFFS' AWARDS**

Date: April 29, 2019

Time: 10:00 a.m.

Before: Hon. Michael Fitzgerald

Courtroom: 5A

MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES AND PLAINTIFFS' AWARDS

1 **PLEASE TAKE NOTICE** that, on April 29, 2019, at 10:00 a.m., or as
2 soon thereafter as the matter may be heard, in Courtroom 5A of the Honorable
3 Michael W. Fitzgerald, United States District Judge for the Central District of
4 California, located at 350 West First Street, Los Angeles, California, Class
5 Counsel, Pomerantz LLP, Bragar Eagel & Squire P.C., and Glancy Prongay &
6 Murray LLP, will and hereby does move the Court for entry of an Order
7 awarding attorneys' fees and reimbursement of litigation expenses (the
8 "Motion").

This Motion is supported by the following Memorandum of Points and Authorities set forth below, the accompanying Joint Declaration of Joshua B. Silverman and David J. Stone in Support of (1) Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (2) Motion for an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Awards for Plaintiffs (the "Joint Declaration") and the exhibits filed therewith, the pleadings and other filings in this Action, and other evidence and argument that may be presented prior to the Court's decision on this Motion.

18 Pursuant to Local Rule 7-3, Class Plaintiffs conferred with Defendants
19 prior to filing this Motion. Defendants do not oppose the relief requested by this
20 Motion.

STATEMENT OF ISSUES TO BE DECIDED

22 1. Whether Class Counsel's application for attorneys' fees of 25% of the
23 Gross Settlement Fund, should be approved in connection with the final approval
24 of the Settlement.

25 2. Whether Class Counsel should be reimbursed for reasonable litigation
26 expenses that were necessarily incurred to achieve the benefit obtained.

27 3. Whether Lead Plaintiffs and Class Representatives, Donald Hu and
28 Brayton Li, are entitled to an award in the amount of \$7,500 each.

1 Dated: April 8, 2019

GLANCY PRONGAY & MURRAY LLP

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*Co-Lead Counsel for Class Plaintiffs
and the Class*

1 **PROOF OF SERVICE BY ELECTRONIC POSTING**

2 I, the undersigned say:

3 I am not a party to the above case, and am over eighteen years old. On
4 April 8, 2019, I served true and correct copies of the foregoing document, by
5 posting the document electronically to the ECF website of the United States
6 District Court for the Central District of California, for receipt electronically by
7 the parties listed on the Court's Service List.

8 I affirm under penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct. Executed on this April 8, 2019, at
10 Los Angeles, California.

12 _____
13 *s/Kara M. Wolke*
14 Kara M. Wolke
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